

ORIGINAL

JUDGE CASTEL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
EDINUEL RODRIGUEZ POLANCO, :
a/k/a "Adinel Polanco- :
Rodriguez," and :
FELIPE GONZALEZ, :
:
Defendants. :
- - - - - X

INDICTMENT

20 CRIM 237

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: MAR 26 2020

COUNT ONE
(Narcotics Conspiracy)

The Grand Jury charges:

1. In or about March 2020, in the Southern District of New York and elsewhere, EDINUEL RODRIGUEZ POLANCO, a/k/a "Adinel Polanco-Rodriguez," and FELIPE GONZALEZ, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that EDINUEL RODRIGUEZ POLANCO, a/k/a "Adinel Polanco-Rodriguez," and FELIPE GONZALEZ, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that EDINUEL RODRIGUEZ

POLANCO, a/k/a "Adinel Polanco-Rodriguez," and FELIPE GONZALEZ, the defendants, conspired to distribute and possess with intent to distribute were (a) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (b) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Indictment, EDINUEL RODRIGUEZ POLANCO, a/k/a "Adinel Polanco-Rodriguez," and FELIPE GONZALEZ, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

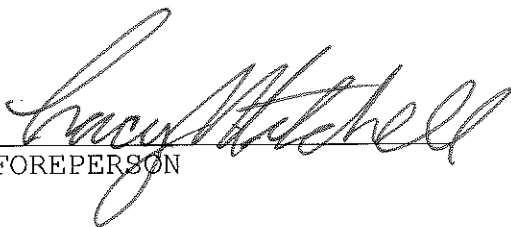
Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

EDINUEL RODRIGUEZ POLANCO,
a/k/a "Adinel Polanco-Rodriguez," and
FELIPE GONZALEZ,

Defendants.

INDICTMENT

20 Cr.

(21 U.S.C. § 846.)

GEOFFREY S. BERMAN
United States Attorney


Foreperson

NE
3/26/2020

Indictment filed
wheel A- Judge Castel

Sarah L. Cave
USMJ